

1 DAVID CHIU, State Bar #189542
City Attorney
2 JAMES F. HANNAWALT, State Bar #139657
Acting Chief Trial Deputy
3 ALEXANDER J. HOLTZMAN, State Bar #311813
JOSE A. ZELIDON-ZEPEDA, State Bar #227108
4 Deputy City Attorneys
Fox Plaza
5 1390 Market Street, 6th Floor
San Francisco, California 94102-5408
6 Telephone: (415) 554-3999 [Holtzman]
Telephone: (415) 355-3312 [Zelidon-Zepeda]
7 Facsimile: (415) 554-3837
Email: alexander.holtzman@sfcityatty.org
8 Email: jose.zelidon-zepeda@sfcityatty.org

9 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
10 AND PAUL MIYAMOTO, IN HIS OFFICIAL
CAPACITY AS SAN FRANCISCO SHERIFF
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12 UNITED STATES DISTRICT COURT
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14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 JOSHUA SIMON, DAVID BARBER, AND
JOSUE BONILLA, INDIVIDUALLY AND
17 ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED, DIANA BLOCK,
18 AN INDIVIDUAL AND COMMUNITY
RESOURCE INITIATIVE, AN
19 ORGANIZATION,

20 Plaintiffs,

21 vs.

22 CITY AND COUNTY OF SAN
FRANCISCO, PAUL MIYAMOTO, IN HIS
23 OFFICIAL CAPACITY AS SAN
FRANCISCO SHERIFF,

24 Defendants.
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Case No. 4:22-cv-05541-JST

**DECLARATION OF ALEXANDER J.
HOLTZMAN ON DEVELOPMENTS RE
SUPPLEMENTAL BRIEFING**

Trial Date: Not Set

DECLARATION OF ALEXANDER J. HOLTZMAN

I, ALEXANDER J. HOLTZMAN, declare as follows:

1. I am an attorney and counsel of record for Defendants in this action. Except where otherwise indicated, the following facts are known to me personally, and if called upon as a witness, I would testify to them competently.

2. Attached as **Exhibit A** to this declaration are true and correct copies of warrants revoking Plaintiff Joshua Simon's own-recognizance release status, dated December 7, 2023, with redactions for Simon's potentially sensitive personal identification information. Based on a search that I conducted using the SFSO's in-custody locator website (<https://www.sfsheriff.com/find-person-jail>), I believe that Simon was arrested on December 7, 2023, and has been detained since then.

3. A review of recently collected documents in this case identified a document reflecting that Plaintiff Josue Bonilla's location information was provided once to the San Francisco Police Department ("SFPD") in connection with a request for location data about a different individual. The information, provided to the SFPD on December 2, 2022, identified Bonilla as present at a certain location at a time on November 28, 2022. Defendants have provided this information with Plaintiffs, along with a redacted copy of the location report containing Bonilla's location information.

4. On December 19, 2023, I conferred by email with Plaintiffs' counsel, seeking Plaintiffs' consent to file this declaration through an administrative motion. On December 28 and 29, 2023, the parties conferred regarding the administrative motion and declaration. Plaintiffs' counsel has informed me Plaintiffs do not oppose filing of this declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on this 2nd day of January, 2024, at San Francisco, California.

/s/ Alexander J. Holtzman

ALEXANDER J. HOLTZMAN